

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Expanding the Economic and Innovation	)	<b>Docket No. 12-268</b>
Opportunities of Spectrum Through Incentive	)	
Auctions	)	

To: The Commission (Electronically Filed)

**COMMENTS OF WATCHTV, INC.**

1. WatchTV, Inc. ("WatchTV") hereby submits these Comments in response to the Commission's *Notice of Proposed Rulemaking* ("NPRM") in the above-captioned proceeding, 27 FCC Rcd. 12357 (2012) (FCC 12-118, rel. Oct. 2, 2012). WatchTV is the licensee of seven Class A Television Stations and seven Low Power Television stations (not including digital companion channels) and has applications pending for construction permits for additional new stations. It thus has a significant stake in this proceeding in terms of the results of repacking the spectrum and the relief made available to displaced Class A and LPTV stations.

2. WatchTV has long been active in the introduction of new services and technologies by its broadcast stations. In recent years, it has been an enthusiastic supporter of the efforts of SpectrumEvolution, Inc. ("SEI") to facilitate flexible spectrum use to improve both broadcast and broadband service to the public.

3. WatchTV is considering contributing Class A stations to the reverse auction, but only because of the constraints the Commission has imposed on TV broadcasters' embracing new technologies as the marketplace develops and dictates. It would much prefer to be able to develop all of its stations into providers of multiple and diverse services, including broadband, while continuing to provide a free broadcast service to the public.

4. Accordingly, WatchTV urges the Commission to give careful attention to the comments of SEI in this proceeding and to unleash the ingenuity of all TV broadcasters, increase economic activity, create jobs, and improve broadband access to the public. All of this can be achieved, if the Commission will allow it, without losing the benefits of dissemination of ideas through television that is a bedrock strength of our democracy and without losing the critical services that broadcasters have proven over and over again that only they can provide when weather, fire, and other disasters strike.

Respectfully submitted,



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